



November 28, 2006

Sent via email

Eric Johnson  
U.S. Environmental Protection Agency  
Region 8, 8ENF-T  
999 18<sup>th</sup> Street, Suite 300  
Denver, Colorado 80202-2466

RE: Progress report for October 2006 activities - Hecla Mining Company Apex Site (EPA ID No. UT982589848, Docket No. RCRA-8-99-06)

Dear Mr. Johnson:

Per paragraph 64 of the Order, enclosed is a copy of the October 2006 progress report for your records.

If you have any questions please do not hesitate to call me at (208) 769-4112 or e-mail at [pglader@hecla-mining.com](mailto:pglader@hecla-mining.com).

Sincerely,

A handwritten signature in black ink, appearing to read "P. Glader", written over a horizontal line.

Paul L. Glader  
Manager Environmental Services

End

Cc: HMC Legal Dept (w/o attachments)  
John Jacus, Esq. (DG&S)



November 28, 2006

Sent via U.S. Mail

Glenn Rogers, Chairman.  
Shivwits Band of Paiute Indian Tribe  
P.O. Box 448  
Santa Clara, Utah 84765

John Krause  
Bureau of Indian Affairs Phoenix Area Office  
U.S. Department of Interior  
P.O. Box 10  
Phoenix, AZ 85001

Kelly Youngbear  
BIA Southern Paiute Agency  
P.O. Box 720  
St. George, UT 84771

RE: Progress report for October 2006 activities - Hecla Mining Company Apex Site (EPA ID No. UT982589848, Docket No. RCRA-8-99-06)

Dear Chairman Rogers, Mr. Krause and Ms. Youngbear:

Per paragraph 64 of the Order, enclosed is a copy of the September 2006 progress report for your records.

If you have any questions please do not hesitate to call me at (208) 769-4112 or e-mail at [pglader@hecla-mining.com](mailto:pglader@hecla-mining.com).

Sincerely,

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Cc: HMC Legal Dept. (w/o attachments)  
John Jacus, Esq. (DG&S) (w/o attachments)  
Eric Johnson (USEPA, Region VIII) (w/o attachments)



November 28, 2006

**MEMORANDUM TO:** Apex File

**COPIES TO:** distribution

**FROM:** Paul Glader

**SUBJECT:** **Progress Report No. 30 for period ending October 31, 2006; Pond 2 Final Closure - Apex Site, Washington County, Utah**

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### **Summary**

The tenth visual inspection, per the long term monitoring plan, was conducted on October 22. No unusual conditions were noted, minor ponding due to precipitation was noted on top of cover. The August 18 repair work on the flow channel on the east side of the pond is functioning well.

The settlement monuments were surveyed in September - no appreciable settlement has been noted.

### **Discussion**

1. Surface Monitor Results To Date – Since monitoring of the top surface began (Jan 4, 2006), there has been no appreciable movement in the surface monuments at the Apex site.

### **Work Planned for Next Period**

1. Visual inspection of site.
2. Settlement monument survey – will take place quarterly basis - December.

### **Sampling and Analysis in Period**

#### *Field Tests, Inspections & QA/QC*

1. The tenth post closure site inspection was done on October 22; a copy of the inspection report is included in the Supplemental Attachments section.

### **Cost and Schedule**

Committed costs in October 2006 were approximately \$177. Total project to date committed is approximately \$1,240,000. The cost report for October is attached.

Current status of the deliverables listed in the RCRA 7003 order is as follows:

<b>Deliverable</b>	<b>Reference Paragraph</b>	<b>Due</b>	<b>Remarks</b>
Post warning signage around perimeter of site	57	<b>15 days after effective date of order</b>	Work completed on March 9, 2004
Begin implementation of closure plan	63	<b>45 days after receipt of filing of order</b>	Work started on February 23, 2004
Monthly progress reports	64	<b>28<sup>th</sup> day after close of month</b>	Requirement in effect after order is filed.
Completion report	66	<b>30 days after completion of all closure plan tasks</b>	Construction completion report submitted on 3/13/2006. A follow-up report to be issued after end of monitoring period.

The update of the schedule milestones is on the following table:

<b>Milestone</b>	<b>Target</b>	<b>Actual</b>	<b>Remarks</b>
Issue bid package – Phase I (Sump Drains)	6/14/04	<b>6/15/04</b>	Portion of RFP materials issued at pre-bid on 6/14/04; remainder sent via courier
Issue RFP package – Phase III	6/24/04	<b>6/24/04</b>	
Award contract for Phase I	6/24/04	<b>6/29/04</b>	Date contract was shipped to Hughes
Pre-bid meeting – Phase III	7/19/04	<b>7/19/04</b>	
Start Phase I (Sump Drains) construction	7/12/04	<b>7/19/04</b>	
Start Phase II (Evaporation)	7/19/04	<b>7/29/04</b>	
Receive bids for Phase III	8/2/04	<b>8/2/04</b>	
Re-bid Phase III contract package	April 2005	<b>4/27/05</b>	Date bid package was sent to Hughes
Start Phase III construction	End of August 2005	<b>8/29/05</b>	Start of contractor mobilization
Complete Phase III construction	Dec 23rd 2005	<b>12/23/05</b>	Completion of contract scope of work
Issue Construction Completion Report	Week of 3/13/2006	<b>3/13/06</b>	

### **Supplemental Attachments**

1. October 22, 2006 long term monitoring inspection report, by D. Truman.
2. October Cost Report

# **Annual Site Inspection Summary Sheet - Apex Site - Pond 2**

**Hecia Mining Company - Long-Term Maintenance and Monitoring Plan**

## **Form 1 of 4 - Summary**

Date: <u>10-22-06</u>			
Inspector: <u>Dan Turner</u>			
Cover System Component	Potential Problem		Limits Potentially Exceeded
Site Perimeter	Erosion or Fencing Issues		NA
Cover System (outslopes, top, rock)	Subsidence		Minor: ponding < 1" some gulying / erosion Yes <input checked="" type="checkbox"/> * No <input type="checkbox"/>
			Significant: see Table 2 Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Embankment Slope Stability		excessive movement or surface cracks > than 1" Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Gulying	on top	depth > 1" Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
		at embankment crest or on outslope	depth > 2" Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
		w/in normal flow channel in diversion channel	no gulying allowed Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
		w/in diversions at toe of impoundment outslope	no gulying allowed Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
		In diversion channel at any other location	NA NA
	Erosion Protection Stability		rock subsiding or missing Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Seepage		no colored seepage allowed (red, blue, yellow w/ crystallization) Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
Runoff Control System	Diversion Channel		rock in place, channel not moving, fence stable Yes <input checked="" type="checkbox"/> * No <input type="checkbox"/>
	Diversion Swales		rock in place, no silting in or head cutting Yes <input checked="" type="checkbox"/> * No <input type="checkbox"/>
	Excessive silt build up at fence lines in diversion channel		allowed if not effecting cover system Yes <input checked="" type="checkbox"/> * No <input type="checkbox"/>

\* Mark all areas of concern or requiring repairs on attached site map.

**Annual Site Inspection - Apex Site - Pond 2**

**Hecia Mining Company - Long-Term Maintenance and Monitoring Plan**

**Form 2 of 4 - Site Perimeter**

Inspection Date: <u>10-22-06</u>	
Inspector: <u>T. R. M. W.</u>	
<b>Visible Outlying Areas</b>	
Observed Condition:	<u>All fence and signs are in good repair</u>
Observed Damage:	<u>None</u>
May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>Property Boundary Fence and Gate (walk fence line)</b>	
Observed Condition:	<u>No problems with fence or gate</u>
Observed Damage:	<u>None</u>
Potential Corrective Actions:	
May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	
<b>All Upgradient Areas (areas that drain onto property)</b>	
Observed Condition:	<u>There was some minor ponding on west side of pond</u>
Observed Damage:	
May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	

\* Mark all areas of concern or requiring repairs on attached site map.

**Annual Site Inspection - Apex Site - Pond 2**

**Hecia Mining Company - Long-Term Maintenance and Monitoring Plan**

**Form 3 of 4 - Impoundment**

Inspection Date: <u>10-22-06</u> Inspector: <u>TRIMMER</u>			
<b>Outslopes</b>			
Observed Performance:	Rock Cover Subsidence:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Excessive Slope Movement (failure):	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Gully Development:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Observable Leachate (colored):	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Excessive Siltation (at slope toe):	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Observed Damage: <u>None</u>			
Potential Corrective Actions:			
<b>Top (top surface soils)</b>			
Observed Performance:	Cracking (>1" width):	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Settlement / Evidence of Ponding:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Erosion / Gullying:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Observed Damage: <u>Some minor ponding on NE side. (No problem)</u>			
Potential Corrective Actions:			
<b>Erosion Protection Layer (rock)</b>			
Observed Performance:	Rock Staying in Place:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Rock Subsiding:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
	Missing Rock:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Observed Damage: <u>None</u>			
Potential Corrective Actions:			

\* Mark all areas of concern or requiring repairs on attached site map.

**Annual Site Inspection - Apex Site - Pond 2**

**Hecla Mining Company - Long-Term Maintenance and Monitoring Plan**

**Form 4 of 4 - Diversion Channel and Swales**

Date: <u>10/22/06</u>			
Inspector: <u>James</u>			
<b>Diversion Channel</b>			
Observed Performance:	Erosion Protection in place:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Normal Flow Channel in place:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
	Encroaching on Site Fencing:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input checked="" type="checkbox"/>
Observed Damage:	<u>no observed damage</u>		
Potential Corrective Actions:	<u>none</u>		
<b>Diversion Swales</b>			
Observed Performance:	Erosion Protection in place:	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input type="checkbox"/>
	Flow Channel Silting In:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input type="checkbox"/>
	Head Cutting:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	May require repair: Yes <input type="checkbox"/> * No <input type="checkbox"/>
Observed Damage:	<u>Flow Line good</u>		
Potential Corrective Actions:	<u>none</u>		

\* Mark all areas of concern or requiring repairs on attached site map.



Activity	2004 Budget	Revised Budget May 2004	Committed Cost this Period	Cumulative Committed Cost To Date 10-31-06	Forecasted Cost To Complete	Forecasted Final Cost	Remarks on Forecast to Complete
<b>Phases I through III (Completed February 2006)</b>							
Phase I - Drain Excess Liquid From Tailings	189,200	72,700		67,928	0	67,928	
Phases II, IIA + IIB - Evaporate Excess Liquid	6,000	8,000		242,882	0	242,882	
Phase III - Regrading & Final Cover System	337,000	342,050		504,742	0	504,742	
Field Indirect Costs	164,500	213,568		378,517	0	378,517	Includes Jan + Feb 2006 long term monitoring costs
Hecla Costs	18,700	18,700	0	33,324	0	33,324	
<b>Subtotal Phases I through III</b>	<b>715,400</b>	<b>655,018</b>	<b>0</b>	<b>1,227,393</b>	<b>0</b>	<b>1,227,393</b>	
<b>Long Term Monitoring (through FY 2010)</b>							
Site Inspections			177	1,101	3,584	4,685	
Settlement Monitoring			0	3,375	6,750	10,125	
<b>Consultant Support:</b>							
Annual Geotechnical Engineer Inspections			0	2,495	18,100	20,595	Includes settlement monitoring data analysis
Vegetation Monitoring			0	0	20,000	20,000	Allowance for surveys in FY 2007, 2009 and 2010
Site Conditions Review - MEI			0	3,161			
Site Conditions Review - SVL Analytical			0	891			
<b>Maintenance:</b>							
Erosion Repair Allowance			0	0	7,500	7,500	
Overseeding Allowance			0	0	9,920	9,920	
<b>Hecla Project Management Costs:</b>							
Labor			0	2,066	8,109	10,175	
Travel expenses			0	0	1,312	1,312	
<b>Subtotal Long Term Monitoring</b>	<b>0</b>	<b>0</b>	<b>177</b>	<b>13,089</b>	<b>75,275</b>	<b>84,312</b>	
<b>Total Pond 2 Final Closure</b>	<b>715,400</b>	<b>655,018</b>	<b>177</b>	<b>1,240,482</b>	<b>75,275</b>	<b>1,311,705</b>	